

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

FILED

APR 17 2013

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
JAMES S. BEDELL,)
)
Defendant.)

CRIMINAL NO. 13-30064-MJR

STIPULATION OF FACTS

Comes now Stephen R. Wigginton, United States Attorney for the Southern District of Illinois through Norman R. Smith, Assistant U.S. Attorney for this District and herewith enter into the following Stipulation of Facts with the defendant, James S. Bedell, represented by his attorney John P. Rogers pertaining to the relevant conduct of the defendant within the scope of U.S.S.G. §1B1.3.

1. James S. Bedell was employed as the Director of Police and was also referred to as the Chief of Police of the City of Edwardsville from approximately 2007 through October 5, 2012.

2. As the Chief of Police of the City of Edwardsville, James S. Bedell's duties, among other things, were to enforce the criminal laws within the City and to collect and properly account for money received by the City of Edwardsville Police Department, including money received from individuals claiming towed and impounded vehicles.

3. 625 ILCS 5/11-208-7 provides generally that municipalities may provide by ordinance procedures for the release of properly impounded vehicles and for the imposition of a reasonable administrative fee. The City of Edwardsville charges a \$300 fee for vehicles towed

as a result of certain enumerated violations. The \$300 administrative fee must be paid by cash or money order and the paid administrative fee is revenue to the City which must be properly accounted for and therefore the funds received are not for the personal use of an employee of the City of Edwardsville.

4. To collect the fees after a vehicle had been impounded, the party responsible for the vehicle's release would come to the City of Edwardsville police department and pay \$300.00 generally to the dispatcher. The dispatcher would then provide the responsible party with a tow release form and a receipt and place the \$300.00 into the impound fee lock box in the dispatch center James S. Bedell as Chief of Police had access to the key for the lock box.

5. James S. Bedell did unlawfully remove cash and money orders from the lockbox and convert the funds to his personal use, generally to support a gambling habit.

6. From in our about July, 2009 and continuing through the end of December 2009, in Madison County, within the Southern District of Illinois, James S. Bedell, while employed as the Chief of Police of the City of Edwardsville, did embezzle, steal, obtain by fraud and knowingly convert to his own use, money, funds, and property worth at least \$5,000 and which was owned by and under the custody and control of the City of Edwardsville. During this period of time he was an agent of the City of Edwardsville, a local government received federal benefits in excess of \$10,000.

7. From in our about January 2010 and continuing through the end of December 2010, in Madison County, within the Southern District of Illinois, James S. Bedell, while employed as the Chief of Police of the City of Edwardsville, did embezzle, steal, obtain by fraud and knowingly convert to his own use, money, funds, and property worth at least \$5,000 and which was owned by and under the custody and control of the City of Edwardsville. During this



period of time he was an agent of the City of Edwardsville, a local government received federal benefits in excess of \$10,000.

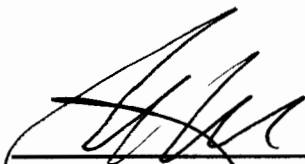
8. From in our about January 2011 and continuing through the end of December 2011, in Madison County, within the Southern District of Illinois, James S. Bedell, while employed as the Chief of Police of the City of Edwardsville, did embezzle, steal, obtain by fraud and knowingly convert to his own use, money, funds, and property worth at least \$5,000 and which was owned by and under the custody and control of the City of Edwardsville. During this period of time he was an agent of the City of Edwardsville, a local government received federal benefits in excess of \$10,000.

9. From in our about January 2012 and continuing through September of 2012, in Madison County, within the Southern District of Illinois, James S. Bedell, while employed as the Chief of Police of the City of Edwardsville, did embezzle, steal, obtain by fraud and knowingly convert to his own use, money, funds, and property worth at least \$5,000 and which was owned by and under the custody and control of the City of Edwardsville. During this period of time he was an agent of the City of Edwardsville, a local government received federal benefits in excess of \$10,000.

SO STIPULATED:

STEPHEN R. WIGGINTON
United States Attorney


JAMES S. BEDELL
Defendant
NORMAN R. SMITH
Assistant United States Attorney



JOHN P. ROGERS
Attorney for Defendant

Date: April 17, 2013

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